

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) AMBER DAWN WATERMAN, and
[DOB: 3-12-1980]

(2) JAMIE S. WATERMAN
[DOB: 6-16-1980]

Defendants.

No.

COUNT 1

18 U.S.C. § 1201(a)

NMT Death

NLT Life Imprisonment

NMT \$250,000 Fine

Class A Felony

COUNT 2

18 U.S.C. § 1841

NLT Life Imprisonment

NMT \$250,000 Fine

Class A Felony

COUNT 3

18 U.S.C. § 3

NMT 15 Years Imprisonment

NMT \$125,000 Fine

NMT 3 Years Supervised Release

Class C Felony

\$100 Special Assessment

(Each Count of Conviction)

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Between October 31, 2022, and November 2, 2022, said dates being approximate, in McDonald County, in the Western District of Missouri, and elsewhere, the defendant, **AMBER DAWN WATERMAN**, did unlawfully and willfully kidnap, abduct, carry away, and hold Ashley Bush, for the purpose and benefit of claiming Valkyrie Grace Willis as the defendant's child, and willfully transported Ashley Bush in interstate commerce from Maysville, Arkansas, across the

state line to Pineville, Missouri, the actions of the defendant resulting in the death of Ashley Bush, all in violation of Title 18, United States Code, Section 1201(a)(1).

COUNT 2

Between October 31, 2022, and November 2, 2022, said dates being approximate, in McDonald County, in the Western District of Missouri, and elsewhere, the defendant, **AMBER DAWN WATERMAN**, did commit the kidnapping resulting in the death of Ashley Bush as charged in Count 1, and thereby caused the death of a child in utero, in violation of Title 18, United States Code, Section 1841.

COUNT 3

Between October 31, 2022, and November 2, 2022, said dates being approximate, in McDonald County, in the Western District of Missouri, and elsewhere, the defendant, **JAMIE S. WATERMAN**, knowing that an offense against the United States has been committed, to wit, kidnapping resulting in death, did receive, relieve, comfort, and assist the offender, Amber Waterman, in order to hinder and prevent the offender's apprehension, trial, and punishment, in violation of Title 18, United States Code, Section 3.

A TRUE BILL.

/s/ Clint Strong

FOREPERSON OF THE GRAND JURY

/s/ Stephanie Wan

STEPHANIE L. WAN
Assistant United States Attorney
Missouri Bar No. 58918

Dated: 6/27/2023
Springfield, Missouri